

### REMARKS

This is a full and timely response to the non-final Official Action mailed **May 19, 2005**. Reconsideration of the application in light of the above amendments and the following remarks is respectfully requested.

By the forgoing amendment, the specification and various claims have been amended. Additionally, new claims 21-23 have been added, and original claims 18-20 have been cancelled. Thus, claims 1-17 and 21-23 are currently pending for further action.

### **Information Disclosure Statement:**

In the outstanding Office Action, the applicant was notified that the Information Disclosure Statement filed on January 8, 2004 fails to comply with 37 C.F.R. 1.98 (a)(1). Consequently, Applicant responds by filing an Information Disclosure Statement to complete the IDS filed on January 8, 2004. No fee is believed to be necessary as the IDS filed herewith is merely completing the earlier filing. However, if any fees are owed in connection with this paper, authorization is hereby given to charge those fees to deposit account number 08-2025 in the name of Hewlett-Packard Company.

### **Drawings:**

In the outstanding Office Action, an objection was raised against Fig. 5 due to an informality. Accordingly, claim 5 has been revised as requested by the Examiner, and a replacement sheet bearing the correct Figure is filed herewith.

The sole change made to Fig. 5 is the relocation of the text “Any Other Languages to Translate Into?” so as to appear above the “Yes” and “No” buttons shown as part of the graphical user interface illustrated in the lower portion of Fig. 5. Substitution of the

replacement sheet for the original sheet bearing Fig. 5 is respectfully requested along with a withdrawal of the objection to Fig. 5.

**Prior Art:**

Claims 1, 5, 8, 12, 15 and 18 were rejected as being anticipated under 35 U.S.C. § 102(b) by U.S. Patent Non. 5,175,684 to Chong (“Chong”). For at least the following reasons, this rejection is respectfully traversed.

Claim 8 recites:

A method of executing a print job of an electronic document, said print job containing translations in a plurality of languages of said document, the method comprising, in conjunction with submitting said print job to a printing device, prompting a user through a graphical user interface to provide user input selecting one or more languages for translation of said document, and automatically translating said electronic document into one or more languages according to said user input with an electronic translation program such that said resulting print job contains hardcopies of said document in a plurality of languages. (emphasis added).

In contrast, Chong does not teach or suggest prompting a user through a graphical user interface to provide user input selecting one or more languages for translation of a document being printed.

The Chong system is designed primarily to allow a user to submit by fax or scanner a document in an original language. (Chong, abstract). The submitted document contains a written cover sheet in a particular format (*See*, Fig. 2) that is understood by the system as an instruction to translate the incoming document into another, target language. “By scanning predefined fields of a cover page of the input data, the server system 10 can automatically recognize the sender's selection of the source language of the input text, the target language(s)

of the output text, a particular sublanguage (specialized field of terminology or correspondence type), any preferred page format for the output text, and the address(es) of one or more addressees to whom the translated text pages are to be sent.” (Chong, col. 4, lines 64-68).

Thus, the Chong system addresses the automatic translation of an existing document into a target language as specified on a written cover sheet. Chong does not teach or suggest any other means of requesting translation of a document into another language and absolutely does not teach or suggesting the claimed method step of prompting a user through a graphical user interface to enter translation instructions.

The method of claim 8 addresses a situation that is not contemplated by Chong. The method of claim 8 is invoked when a typical computer user wants to print an electronic document and needs copies in one or more different languages than the language in which the document was generated. In connection with the creation and submission of a print job for the document, the user is prompted to specify a number of target languages into which the document will be translated. Chong fails to teach or suggest this subject matter.

"A claim is anticipated [under 35 U.S.C. § 102] only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 2 U.S.P.Q.2d 1051, 1053 (Fed. Cir. 1987) (emphasis added). See M.P.E.P. § 2131. For at least this reason, the rejection of claim 8 and its dependent claims should be reconsidered and withdrawn.

Claim 1 recites:

A system for executing a print job of an electronic document, said print job containing translations in a plurality of languages of said document, the system comprising:

a translation module of a printer driver running on a host computer, wherein said translation module accepts user input through a graphical user interface specifying at least one additional language into which a document of a print job is to be translated and calls a translation program to perform translation of the document; and

a printer for printing said print job including at least one hardcopy of said document translated into said additional language.  
(emphasis added).

In contrast, as demonstrated above, Chong does not teach or suggest the claimed graphical user interface. Moreover, Chong does not teach or suggest the claimed printer driver comprising a translation module.

As is well understood in the art, a printer driver is a piece of software specific to a given printer that formats a print job according to the specific operation of that printer. Chong does not teach or suggest such a piece of software. One of skill in the art would assume that the Chong system, if making use of a printer, would have to further include a printer driver for that printer. Again, the Chong system addresses an entirely different scenario that does the claimed system.

Thus, Chong fails to teach either the printer driver or the graphical user interface recited in claim 1. "A claim is anticipated [under 35 U.S.C. § 102] only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 2 U.S.P.Q.2d 1051, 1053 (Fed. Cir. 1987) (emphasis added). See M.P.E.P. § 2131. For at least this reason, the rejection of claim 1 and its dependent claims should be reconsidered and withdrawn.

Independent claim 15 recites:

A printer driver stored on a medium for storing computer-readable instructions, said printer driver comprising:  
a graphical user interface for accepting user input; and

a translation module, wherein said translation module receives user input specifying at least one additional language into which a document of a print job is to be translated and calls a translation program to perform translation of the document.

As demonstrated above, Chong does not teach either a printer driver as recited in claim 15 or a graphical user interface for accepting user input.

Moreover, claim 15 recites a printer driver that is stored on a medium for storing computer-readable instructions that, as such, can be installed on any general purpose computer. In contrast, the Chong system is an elaborate system with hardware and firmware components that is not, and cannot be, stored on a medium and installed on any other computer. Consequently, the subject matter of claim 15 includes elements and features, and provides results and capabilities, that are beyond the scope of the Chong system.

"A claim is anticipated [under 35 U.S.C. § 102] only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 2 U.S.P.Q.2d 1051, 1053 (Fed. Cir. 1987) (emphasis added). See M.P.E.P. § 2131. For at least these reasons, the rejection of claim 15 and its dependent claims should be reconsidered and withdrawn.

Claims 2, 9, 16 and 19 were rejected as being unpatentable under 35 U.S.C. § 103(a) over the combined teachings of Chong and U.S. Patent No. 6,639,687 to Neilsen ("Neilsen"). This rejection is traversed for at least the same reasons given above with respect to the independent claims from which these claims depend.

Claims 3, 4, 10, 11, 17 and 20 were rejected as being unpatentable under 35 U.S.C. § 103(a) over the combined teachings of Chong, Neilson and U.S. Patent No. 6,592,275 to Aihara (“Aihara”). This rejection is respectfully traversed for at least the following reasons.

Claim 3 recites “wherein said printer comprises a plurality of output receptacles and said translation module further accepts user input specifying a number of hardcopies of said document in various languages to be output to specific output receptacles.” Claims 10 and 17 recite similar subject matter.

In contrast, the combination of Chong, Neilson and Aihara fails to teach or suggest this subject matter. The Office Action concedes that Cong and Neilson do not teach or suggest the subject matter of claim 3 (Action of 5/19/05, p. 8), hence the citation to Aihara. However, Aihara does not teach or suggest a system that accepts user input specifying a number of hardcopies of a document to be printed in various languages to specific output receptacles.

Rather, Aihara, as cited, merely teaches assigning specific users to specific “bins” of a printing system. (Aihara, Figs. 11 and 13). Thus, any printing done by the specified user or intended for the specified user will go to the specified bin. (Aihara, col. 6, lines 33-41) The person printing cannot, as in claim 3, specify the output receptacle to which a multi-lingual print job is printed. For at least this reason, the rejection of claim 3, 4, 10, 11 and 17 should be reconsidered and withdrawn.

Claim 4 recites “wherein at least one output receptacle receives hardcopies of said document in a plurality of languages.” Claim 11 recites similar subject matter.

In contrast, there is no teaching or suggestion in the prior art of record of outputting documents in multiple language to the same output receptacle. For at least this additional reason, the rejection of claims 4 and 11 should be reconsidered and withdrawn.

Claims 6, 7, 13 and 14 were rejected as being unpatentable under 35 U.S.C. § 103(a) over the combined teachings of Chong and the “well known prior art.” This rejection is respectfully traversed for at least the following reasons.

The rejection of claims 6 and 13 is traversed for at least the same reasons given above with respect to the independent claims from which claims 6 and 13 respectively depend.

Claim 7 recites that “said host computer is connected to the Internet and said translation program is a program residing on the Internet.” The Office Action argues “it is well known in the art that computer systems separate from other computer systems can be connected via a network (such as a LAN or WAN) and even the Internet.” (Action of 5/9/05, p. 10). This is true, however, it is not the full substance of what claim 7 recites.

Claim 7 recites that a translation module of a printer driver, in response to user input, accesses a translation program on the Internet to effect translation of a document being processed into a multi-lingual print job. Thus subject matter is not taught or suggested by the prior art of record and is certainly not “well known” prior art.

"The examiner may take official notice of facts outside of the record which are capable of instant and unquestionable demonstration as being "well-known" in the art. In re Ahlert, 424 F. 2d 1088, 165 USPQ 418, 420 (CCPA 1970). . . . If the applicant traverses such an assertion the examiner should cite a reference in support of his or her position." M.P.E.P § 2144.03. Thus, Applicant respectfully requests that prior art be cited that teaches the subject matter of claim 7 or the rejection of claim 7 be withdrawn. The same applies to claim 14.

**Conclusion:**

The newly added claims are thought to be patentable over the prior art of record for at least the same reasons given above with respect to the original independent claims.

Therefore, examination and allowance of the newly added claims is respectfully requested.

For the foregoing reasons, the present application is thought to be clearly in condition for allowance. Accordingly, favorable reconsideration of the application in light of these remarks is courteously solicited. If the Examiner has any comments or suggestions which could place this application in even better form, the Examiner is requested to telephone the undersigned attorney at the number listed below.

Respectfully submitted,



Steven L. Nichols  
Registration No. 40,326

DATE: 17 August 2005

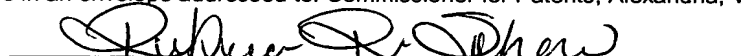
Steven L. Nichols, Esq.  
Managing Partner, Utah Office  
**Rader Fishman & Grauer PLLC**  
River Park Corporate Center One  
10653 S. River Front Parkway, Suite 150  
South Jordan, Utah 84095

(801) 572-8066  
(801) 572-7666 (fax)

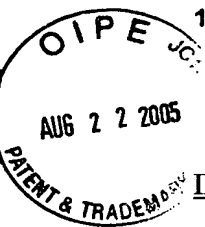
**CERTIFICATE OF MAILING**

DATE OF DEPOSIT: August 17, 2005

I hereby certify that this correspondence is being deposited with the United States Postal Service as first class mail on the date indicated above in an envelope addressed to: Commissioner for Patents, Alexandria, VA 22313-1450.

  
Rebecca R. Schow



IN THE DRAWINGS:

Please replace Fig. 5 with the attached replacement sheet.

The corrected Fig. 5 is shown below.

Language of Original Document Produced: <input type="text"/>	84		
Language to Translate Document Into: <input type="text"/>			
Number of Copies of Translated Document: <input type="text"/>			
Any Other Languages to Translate Into? <table border="0"><tr><td><input type="checkbox"/> Yes</td><td><input type="checkbox"/> No</td></tr></table>	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
<input type="checkbox"/> Yes	<input type="checkbox"/> No		

Second Language to Translate Document Into: <input type="text"/>	86		
Number of Copies of Translated Document: <input type="text"/>			
Third Language to Translate Document Into: <input type="text"/>			
Number of Copies of Translated Document: <input type="text"/>			
Any Other Languages to Translate Into? <table border="0"><tr><td><input type="checkbox"/> Yes</td><td><input type="checkbox"/> No</td></tr></table>	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
<input type="checkbox"/> Yes	<input type="checkbox"/> No		

**FIG 5**